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January 20, 2021

Honorable Robert D. Drain
United States Bankruptcy Court
300 Quarropas Street
White Plains, New York 10601

Re: In re Sears Holdings Corporation, et al., Case No. 18-23538 (rdd)
January 21, 2021 Status Conference

Dear Judge Drain:

On behalf of Orient Craft Limited, an opt-out administrative creditor with no pending objection to its claim, I write in connection with tomorrow's Status Update on Debtors' Progress Toward Effective Date.

It is my understanding that the Debtors are to file quarterly reports regarding a status update on progress towards an effective date of the confirmed plan. The last report that was filed was in June. Why was no report filed in September? Or December?

Beginning in November of 2020, I tried to obtain certain information from the Administrative Expense Claims Representative, but the following questions remain unanswered.

1. A variance of \$40 million in additional administrative expenses was listed in the June report but, as I recall from the Debtors' discussion during the omnibus hearing, no information on this line item was given and this was the biggest, adverse variance from the projections at that time.
2. D&O insurance: how much money remains or has it all been used up?
3. Approximately how much money is needed for the Plan to become effective?
 - a. If allowed claims to date were paid 28.3%; how much is needed for them to get 75/80%?
 - b. How many creditors opted out and approximately how much money does this represent?

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4. What is the status of the \$25 million litigation fund?

It is requested that these questions be addressed at tomorrow's status conference.

Respectfully submitted,

David Wander

David H. Wander

cc via email: Sunny Singh, Esq.